

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEANNETTE FULLER HAUSLER as Successor
Personal Representative of the Estate of
ROBERT OTIS FULLER (“BOBBY
FULLER”), et. al,

Petitioner,

-against-

JPMORGAN CHASE BANK, N.A., et. al,

Garnishee-Respondents.

09 Civ. 10289 (VM)

Related to JPM Chase/Citibank
Turnover Proceeding

In Respect of a Judgment
Entered in the State of Florida,
Case No. 02-12475-CA-09

JPMORGAN CHASE BANK, N.A., et. al,

Garnishee-Respondents and Third-Party Petitioners.

MOTION TO ADMIT COUNSEL PRO HAC VICE

-against-

BANCO FINANCIERO INTERNACIONAL
S.A., et al,

Adverse Claimants-Respondents.

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District
Courts for the Southern and Eastern Districts of New York, I, Thatcher Stone a member

in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

David M. Kirstein
Kirstein & Young, PLLC
1750 K Street, NW, suite 200
Washington, D.C. 20006
Phone: 202.331.3348
Fax: 202.331.3933

David M. Kirstein is a member in good standing of the Bar of the District of Columbia. There are no pending disciplinary proceedings against David M. Kirstein in any State or Federal court. A proposed Order for the Court's consideration is attached.

Respectfully submitted,

Dated: New York, New York
April 12, 2011



Thatcher A. Stone (TS5571)

45 Rockefeller Plaza
Suite 2000
New York, New York 10111
(212)332-2477 - phone
thatcher@thatcher-stone-legal.com

Attorneys for Adverse Claimant - Respondent
LTU Lufttransport-Unternehmen GmbH

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

	x	
	:	
JEANNETTE FULLER HAUSLER as Successor	:	
Personal Representative of the Estate of	:	
ROBERT OTIS FULLER ("BOBBY	:	
FULLER"), et. al,	:	
	:	
Petitioner,	:	
	:	
-against-	:	09 Civ. 10289 (VM)
	:	
JPMORGAN CHASE BANK, N.A., et. al,	:	Related to JPM Chase/Citibank
	:	Turnover Proceeding
Garnishee-Respondents.	:	
	:	In Respect of a Judgment
	:	Entered in the State of Florida,
	:	Case No. 02-12475-CA-09
	x	
	:	
JPMORGAN CHASE BANK, N.A., et. al,	:	AFFIRMATION OF
	:	THATCHER A. STONE IN
Garnishee-Respondents	:	SUPPORT OF MOTION TO
and Third-Party	:	ADMIT COUNSEL PRO HAC
Petitioners,	:	VICE
	:	
-against-	:	
	:	
BANCO FINANCIERO INTERNACIONAL	:	
S.A., et al,	:	
	:	
Adverse Claimants-	:	
Respondents.	:	
	x	

**AFFIRMATION OF THATCHER A. STONE IN SUPPORT OF MOTION TO
ADMIT COUNSEL PRO HAC VICE**

I, Thatcher A. Stone, an attorney admitted before all of the Courts of the State of New York, and admitted before this Court, hereby affirm under penalty of perjury pursuant to N.Y. CPLR 2106 as follows:

1. I am counsel for Adverse Claimant-Respondent LTU Lufttransport-Unternehmen GmbH, in the above captioned action. I am familiar with the proceedings in this case. I

make this statement based on my personal knowledge of the facts set forth herein and in support of Adverse Claimant-Respondents' motion to admit David M. Kirstein as counsel pro hac vice to represent Adverse Claimant-Respondent LTU Lufttransport-Unternehmen GmbH in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in March 1983 . I am also admitted to the bar of the United States District Court for the Southern District of New York, since 1983, and am in good standing with this Court.

3. David M. Kirstein is a Partner at Kirstein & Young, PLLC in Washington, D.C.

4. I have found David M. Kirstein to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure. We are adjunct faculty at the Univ. of Virginia Law School where we have taught a course together for seven years. He is a capable and experienced advocate.

5. Accordingly, I am pleased to move for the admission of David M. Kirstein, pro hac vice.

6. I respectfully submit a proposed order granting the admission of David M. Kirstein, pro hac vice, which is attached hereto as Exhibit A. A certificate as to his good standing before the Courts of the District of Colombia is attached as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit David M. Kirstein, pro hac vice, to represent Adverse Claimant-Respondent LTU Lufttransport-Unternehmen GmbH in the above captioned matter, be granted.

Respectfully submitted,

Dated: New York, New York
April 12, 2011



Thatcher A. Stone (TS5571)

45 Rockefeller Plaza
Suite 2000
New York, New York 10111
(212)332-2477 - Phone
thatcher@thatcher-stone-legal.com
Attorneys for Adverse Claimant - Respondent
LTU Lufttransport-Unternehmen GmbH

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

	X	
	:	
JEANNETTE FULLER HAUSLER as Successor	:	
Personal Representative of the Estate of	:	
ROBERT OTIS FULLER ("BOBBY	:	
FULLER"), et. al,	:	
	:	
Petitioner,	:	
	:	
-against-	:	
	:	09 Civ. 10289 (VM)
JPMORGAN CHASE BANK, N.A., et. al,	:	
	:	Related to JPM Chase/Citibank
Garnishee-Respondents.	:	Turnover Proceeding
	:	
	:	In Respect of a Judgment
	:	Entered in the State of Florida,
	:	Case No. 02-12475-CA-09
JPMORGAN CHASE BANK, N.A., et. al,	X	
	:	
Garnishee-Respondents	:	ORDER FOR ADMISSION
and Third-Party	:	PRO HAC VICE ON
Petitioners,	:	WRITTEN NOTICE
	:	
-against-	:	
	:	
BANCO FINANCIERO INTERNACIONAL	:	
S.A., et al,	:	
	:	
Adverse Claimants-	:	
Respondents.	:	
	X	

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN NOTICE

Upon the motion of Thatcher A. Stone, attorney for Adverse Claimant-
Respondent LTU Lufttransport-Unternehmen GmbH;

IT IS HEREBY ORDERED that

David M. Kirstein
Kirstein & Young, PLLC

1750 K Street, NW, suite 200
Washington, D.C. 20006
Phone: 202.331.3348
Fax: 202.331.3933
dkirstein@yklaw.com

is admitted to practice pro hac vice as Counsel for LTU Lufttransport-Unternehmen GmbH in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this court are subject to the local rules of this court, including the Rules governing discipline of attorneys. This action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

New York, New York

April __, 2011

Judge, United States District Court

EXHIBIT B



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

DAVID M. KIRSTEIN

was on the 1ST day of JUNE, 1982

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on April 11, 2011.

JULIO A. CASTILLO
Clerk of the Court

By: 
Deputy Clerk

